

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In the Matter of)
Implementation of Section 621(a)(1) of)
The Cable Communications Policy Act) **MB Docket No. 05-311**
Of 1984 as Amended by the Cable)
Television Consumer Protection and)
Competition Act of 1992)

COMMENTS FROM WOMEN IMPACTING PUBLIC POLICY

Women Impacting Public Policy (WIPP) is a national, bi-partisan public policy organization representing more than 505,000 women in business and women business owners nationwide.

WIPP advocates for and on behalf of women and minorities in business, strengthening their sphere of influence in the legislative and regulatory process of our nation, creating economic opportunities and building bridges and alliances to other small business organizations.

WIPP supports the call for increased competition in the cable services marketplace, and we support policies that will lead us there. As business people, we know a competitive market will cause an increase in investment in new technologies and infrastructure and small business owners stand to gain from this increased investment. This also leads to better access to advanced services, and competitive pricing options that allow our businesses flexibility and provide greater choice for consumers.

In October of 2005, Dr. Esteban Soriano from the California Small Business Foundation issued a report entitled "Broadband Video Access and Economic Advancement: Cable's Unrealized Potential for Big Impact on Small Business." The report found that most small business owners do not use cable Internet or TV services because traditional cable companies do not make these tools readily or affordably available. The study also found that "small business owners believe competition in cable industry will result in better pricing, technology and accessibility that will allow them to improve their profits."

Cable competition will benefit business owners as well as consumers

In most parts of the country, if you want cable television there is only a single cable provider. Without the forces of effective competition in play, that provider through the years has held an effective monopoly in each local market. The result has been an almost yearly increase in cable rates that even competing satellite operators have not been able to align. The Commission's own reports show cable rates have risen across the country nearly 90% during the past 10 years.

The rate increases negatively impact subscribership, as shown by Dr. Soriano's study. For those who do subscribe, the rate increases place additional strain on the budgets of small business owners. This is an especially difficult cost burden for women and minority businesses that already face disparate challenges in the business community. Business owners are constantly looking to competing vendors for cost-savings and with cable they do not have a choice. Both small and large businesses that are cable consumers would benefit tremendously from the inherent advantages of competition like lower prices, better customer service, and higher quality products, if cable had meaningful competition.

The FCC should seek an updated regulatory framework to promote greater choice in providers

It is part of WIPP's organizational mission is to advocate for the creation of further economic opportunities for women owned businesses. WIPP believes this proceeding provides the Commission with an opportunity to examine ways to increase competition for cable services which can lead to greater benefits for its members. WIPP believes the Commission should take the necessary steps in this proceeding to remove any unreasonable impediments to investment. This investment will lead to greater competition among cable providers. The delay of competition not only harms consumers with inflated prices and poorer customer service, but also takes away potential business opportunities from small business owners who sell to those companies seeking to make investments.

This proceeding specifically was opened by the Commission to review items such as the local franchising process. The franchising process is decades old and does not reflect the current environment. Today, cable companies also compete to provide voice services to small business. Small businesses have benefited from the expanded competition for our telephone services. Telephone companies have stated their interest in expanding their offerings to include video services. Similar to the competition for telephone services, competition for video offerings will benefit small business owners.

Conclusion

WIPP is an organization which represents over half a million small businesses and increased competition in the cable television market is an issue that our

membership is behind. We see multiple benefits to both our professional, female constituency and to the overall public with the creation of an open, diverse, pro-consumer market for cable subscribers. The Commission should remove any barriers that are limiting investment. Small businesses are the economic engine of the country. Increased competition for the cable services will benefit our members in at least two areas. First, competition will lead to lower prices for the cable services purchase. Second, it will provide the opportunity to sell more goods and services to companies that are investing. In short, the increased competition for cable services will help make this economic engine grow.

Thank you for taking the first steps towards a vibrant and flourishing cable market by considering and heeding this public comment to the NPRM. The decisions made by policy makers today are ones that will have a lasting impact on our small businesses tomorrow.

President

By: _____
Barbara Kasoff

February 13, 2006